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9 Attorneys for Plaintiffs  
GOLDEN BEAR MANAGEMENT CORPORATION  
10 AND DELTA ADJUSTING COMPANY

11 UNITED STATES DISTRICT COURT  
12 EASTERN DISTRICT OF CALIFORNIA  
13

14 GOLDEN BEAR MANAGEMENT  
CORPORATION AND DELTA ADJUSTING  
15 COMPANY,

16 Plaintiffs,

17 v.

18 CERTAIN UNDERWRITERS AT LLOYD'S  
LONDON, SUBSCRIBING TO POLICY NO.  
19 50006700119,

20 Defendant.  
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Case No. 2:22-cv-02097 JAM-DB

JOINT MID-LITIGATION STATEMENT  
AND STIPULATION TO EXTEND  
DISCOVERY DEADLINE

**ORDER MODIFYING PRETRIAL  
SCHEDULING ORDER**

1 Plaintiffs Golden Bear Management Corporation and Delta Adjusting Company and  
2 Defendant Certain Underwriters at Lloyd's London, Subscribing to Policy No. 50006700119  
3 submit the following mid-litigation statement.

4 1. Lead counsel for Plaintiffs recently changed law firms. Counsel's new law firm, Phelps  
5 Dunbar, has a conflict with certain of the Defendant Underwriters, and therefore cannot continue  
6 to represent Plaintiffs in this action. Plaintiffs have been diligently working to obtain new  
7 counsel, and anticipate filing substitutions of counsel shortly.

8 2. In light of the conflict, the Parties have halted discovery until Plaintiffs have obtained  
9 new counsel.

10 3. Because the deadline to complete discovery is currently set for June 21, 2024, the  
11 Parties informed the Courtroom Deputy of the issue by emails dated May 24, 2024 prior to filing  
12 anything with the Court, as directed by the Court's order dated July 12, 2023. [Dkt. 18]. The  
13 Parties have now agreed to extend the deadline to complete all pending discovery by 30 days, and  
14 seek Court approval of that agreed-to extension. This is the first request to extend the deadline.

15 WHEREAS, as required by the Court's order dated July 12, 2023, the Parties state that  
16 Plaintiffs have filed a motion to amend the pleadings, which is fully briefed, and which the Court  
17 has indicated it will rule on without oral argument. The Parties further anticipate that they may  
18 file motions for summary judgment.

19 **THEREFORE, THE PARTIES STIPULATE AND AGREE AS FOLLOWS:**

20 The deadline for completing pending discovery, currently set for June 21, 2024, shall be  
21 extended up to and including July 22, 2024.

22 Respectfully submitted,

23 Dated: June 17, 2024

FAEGRE DRINKER BIDDLE & REATH LLP

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25 By: /s/ Susan Y. Ly  
Susan Y. Ly

26 Attorneys for Plaintiffs  
27 GOLDEN BEAR MANAGEMENT  
CORPORATION and DELTA ADJUSTING  
28 COMPANY

1 Dated: June 10, 2024

LEHAVI STARGARDTER, LLP

2  
3 By: /s/ Limor Lehavi (as authorized on June 8,  
4 2024)

Limor Lehavi

5 Attorneys for Defendant  
6 CERTAIN UNDERWRITERS AT LLOYD'S  
7 LONDON  
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**ORDER MODIFYING PRETRIAL SCHEDULING ORDER**

Based on the stipulation of the parties and good cause appearing, the Pretrial Scheduling Order, is **MODIFIED** as follows:

Event	Deadline
Discovery Cutoff Date	07/26/2024
Dispositive Motion Filing Deadline	09/20/2024
Dispositive Motion Hearing	11/19/2024, at 01:00 p.m. <sup>1</sup>
Joint Pretrial Statement	01/09/2025
Final pretrial conference	01/17/2025, at 10:00 a.m.
Jury Trial (2-3 Days)	03/03/2025, at 9:00 a.m.

All other instructions contained in the July 12, 2023 Pretrial Scheduling Order (ECF No. 18) shall remain in effect.

**IT IS SO ORDERED.**

Dated: June 17, 2024

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE

<sup>1</sup> Calendars are subject to last minute changes. Contact the Courtroom Deputy for available dates.